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September 30, 2021

By ECF

The Honorable Vernon S. Broderick
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square – Room 518
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED** *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 10/1/2021

Re: *Beauregarde Holdings, LLP, et al., v. The Province of La Rioja*, No. 21 Civ. 3574 (VSB)

Dear Judge Broderick:

We are counsel to all parties in the above-referenced action. In accordance with the August 25, 2021 Order granting a stay of proceedings (ECF 38), we write jointly to inform the Court that the parties expect to be in a position to dismiss the above-captioned case very shortly.

As we advised Your Honor in a joint submission dated August 25, 2021 (ECF 37), the parties reached an agreement on a restructuring that will, among other things, render moot the claims raised in this action. On September 22, 2021, The Province of La Rioja announced that it received the required consents for the agreed restructuring and is now in the process of completing auxiliary matters related to the transaction, a process that will take several more days.

We accordingly respectfully request a continuance of the stay currently in place until further notice from the parties. This is the parties' first request for a continuance of the stay in this matter.

The parties propose to submit a further status report on or before October 14, 2021, in the unlikely event that the restructuring transaction has not been completed and the case dismissed before that date.

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Respectfully submitted,

/s/ Dennis H. Hranitzky

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/s/ Carmine D. Bocuzzi, Jr.

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